Iowa Department of Natural Resources
Title V Operating Permit

Name of Permitted Facility: Cryovac Inc., Sealed Air Corporation

Facility Location: 1125 Wilson Ave. SW, Cedar Rapids, IA 52404

Air Quality Operating Permit Number: 98-TV-031R1-M001
Expiration Date: October 23, 2010
Permit Renewal Application Deadline: April 23, 2010

EIQ Number: 92-9095
Facility File Number: 57-01-082

Responsible Official
Name: David J. Drahn
Title: Plant Manager
Mailing Address: PO Box 1167, Cedar Rapids, IA 52406
Phone #: 319-364-0141

Permit Contact Person for the Facility
Name: David J. McKenzie
Title: Environmental Coordinator
Mailing Address: P.O. Box 1167, Cedar Rapids, IA 52406
Phone #: 319-368-3201

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

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Douglas A. Campbell, Supervisor of Air Operating Permits Section Date

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Abbreviation

acfm.....actual cubic feet per minute
ATI.....authorization to install
CFR.....Code of Federal Regulation
^{o}F.....degrees Fahrenheit
EIQ.....emissions inventory questionnaire
gr./dscf .....grains per dry standard cubic foot
gr./100 cf.....grains per one hundred cubic feet
IAC.....Iowa Administrative Code
IDNR.....Iowa Department of Natural Resources
MVAC.....motor vehicle air conditioner
NSPS.....new source performance standard
ppmv .....parts per million by volume
lb./hr.....pounds per hour
lb./MMBtu .....pounds per million British thermal units
LCPH .....Linn County Public Health
LCO.....Linn County Ordinance
PTO.....permit to operate
scfm.....standard cubic feet per minute
TPY .....Tons per year
USEPA.....United States Environmental Protection Agency

Pollutants

PM.....particulate matter
PM_{10} .....particulate matter ten microns or less in diameter
SO_2 .....sulfur dioxide
NO_x .....nitrogen oxides
VOC .....volatile organic compound
CO.....carbon monoxide
HAP.....hazardous air pollutant
O_3 .....ozone

I. Facility Description and Equipment List

Facility Name: **Cryovac Inc., Sealed Air Corporation**
Permit Number: **98-TV-031R1-M001**

Facility Description: Plastics Products

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	LCPH ATI / PTO Numbers
311	E1	Press Underground Tunnel Exhaust	0 / 3572
312	E2	Press Underground Tunnel Exhaust	0 / 3573
332	IR1	Pump Cleaning Room Exhaust	0 / 3584
334	IR2	Ink Room Floor Exhaust	0 / 3585
335	IR3	Ink Mixing Room Exhaust	0 / 3586
336	IR4	Ink Mixing Station Exhaust	0 / 3587
413	D1	Press Dust Collector	- / -
414	D2	End Seal Dust Collector (E)	- / -
415	D3	End Seal Dust Collector (W)	- / -
3011E	P1	Press 1 Exhaust	4211 / 4278
3011E	P1A	Press 1 Dryer	4211 / 4278
3013E	P1C	Press 1 Corona Treater	4097 / 4279
3061E	P6	Press 6 Exhaust	0 / 3571
3061E	P6A	Press 6 Dryer	0 / 3571
3061E	P6B	Press 6 Flame Treater	0 / 3571
3092E	P9	Press 9 Exhaust	4910 / 4949
3092E	P9A	Press 9 Dryer	4910 / 4949
3093E	P9C	Press 9 Corona Treater	4909 / 4950
3101E	P10	Press 10 Exhaust	4911 / 4947
3101E	P10A	Press 10 Dryer	4911 / 4947
3102E	P10C	Press 10 Corona Treater	4908 / 4948
3111E	P11	Press 11 Exhaust	4733 / 4805
3111E	P11A	Press 11 Interstation Dryer	4733 / 4805
3113E	P-11A	Press 11 Tunnel Exhaust	4734 / 4806
3114E	P11C	Press 11 Corona Treater	4735 / 4807
3122E	P12	Press 12 Exhaust	5058 / 5068
3122E	P12A	Press 12 Dryer	5058 / 5068
3123E	P12C	Press 12 Corona Treater	5059 / 5069
3141E	P14	Press 14 Exhaust	3075 / 3580
3141E	P14A	Press 14 Dryer	3075 / 3580
3141E	P14B	Press 14 Oven	3075 / 3580
3141E	P14D	Press 14 Catalytic Oxidizer	3075 / 3580
3142E	P14E	Press 14 Bypass Stack	3075 / 3601

Emission Point Number	Emission Unit Number	Emission Unit Description	LCPH ATI / PTO Numbers
3143E	P14C	Press 14 Corona Treater	3097 / 3588
3501E	S1	Solvent Wash Station Exhaust	2270 / 3589
4012E	L1C1	Laminator 1 Patch Corona Treater	4249 / 4340
4013E	L1C2	Laminator 1 Barrier Corona Treater	4250 / 4341
5071E	ES7C	End Seal Bag Machine No. 7	5186 / 5195

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
B1	Boiler 1
B2	Boiler 2
H19	Building 10 Space Heater
H20	Building 10 Space Heater
H9	Space Heater – Old Dock
L1	Laminator
L1A	Laminator – Natural Gas Combustion
MW1	Maintenance Welding
O1	2 Plate Processors
T1	Hazardous Waste Tank
T2	Storage Tank
T3	Storage Tank
T4	Storage Tank
10-10	Photopolymer Exhaust

II. Plant-Wide Conditions

Facility Name: **Cryovac Inc., Sealed Air Corporation**
Permit Number: **98-TV-031R1-M001**

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Less than 5 years
Commencing on: October 24, 2005
Ending on: October 23, 2010

Amendments, modifications and reopening of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Plant-Wide Limits
The plant as a whole shall not exceed the following:

Pollutant: Hazardous Air Pollutants (HAP)
Permit Limits: 1. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purpose other than printing and publishing.
2. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purpose other than printing and publishing.
As stated in 40 CFR 63.820(a)(2)(i) and (ii) Subpart KK

This condition was requested by the applicant
Authority for Requirement: 567 IAC 22.108(14)

Plant-Wide Recordkeeping Requirements:
The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
As stated in 40 CFR 63.829(d) Subpart KK

This condition was requested by the applicant
Authority for Requirement: 567 IAC 22.108(14)

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 20% opacity
Authority for Requirement: LCO 10.7

Sulfur Dioxide (SO_2): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"
LCO 10.12(2)

Particulate Matter:
No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.
For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).
Authority for Requirement: 567 IAC 23.3(2)"a"

Particulate Matter: No person shall permit, cause, suffer or allow the emission of particulate matter into the atmosphere in any one hour from any emission point from any process equipment at a rate in excess of that specified in Table I for the process weight rate allocated to such emission point. The emission standards in LCO 10.9 (1)"a" shall apply and those specified in LCO 10.8 and 10.9 and Table I shall not apply to each process of the types listed in those sections, with the following exception: whenever the compliance status, history of operations, ambient air quality in the vicinity, or the type of control equipment utilized, would warrant maximum control, the Air Pollution Control Officer may enforce 0.1 grain per standard cubic foot of exhaust gas, or Table I of this section, whichever would result in the lowest allowable emission rate.
Authority for Requirement: LCO 10.9(1)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"
LCO 10.13

Regulatory Authority

This facility is located in Linn County, Iowa. Linn County Public Health Department, under agreement with the Iowa Department of Natural Resources (IDNR), is the primary regulatory agency in Linn County. This Title V permit is issued by the Iowa Department of Natural Resources, however, required contacts and information submittals referred to in this permit as required by "the Department" should continue to be directed to the Linn County Public Health Department office. This will include such items as stack test notification, stack test results submittal, oral and written excess emission reports, and reports and records required in the Linn County construction permits. Information specifically required by the Title V permit such as the annual EIQ and fees, annual compliance certification, semi-annual monitoring report and any Title V forms submitted for updates, modifications, renewals, etc. must be submitted to the Iowa DNR.

Authority for Requirement: 567 IAC 22.108

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Cryovac Inc., Sealed Air Corporation is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Cryovac Inc., Sealed Air Corporation shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

III. Emission Point-Specific Conditions

Facility Name: **Cryovac Inc., Sealed Air Corporation**
Permit Number: **98-TV-031R1-M001**

Emission Point ID Number: 311, 312

Table 1. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	LCPH ATI / PTO
311	E1	Press Underground Tunnel Exhaust	Solvents	70 lb/hr	0 / 3572
312	E2	Press Underground Tunnel Exhaust		70 lb/hr	0 / 3573

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

See II. Plant-Wide Conditions for Plant-Wide Emission Limits.

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 332, 334, 335, 336

Table 2. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	LCPH ATI / PTO
332	IR1	Pump Cleaning Room Exhaust	Solvents	70 lb/hr	0 / 3584
334	IR2	Ink Room Floor Exhaust		70 lb/hr	0 / 3585
335	IR3	Ink Mixing Room Exhaust		70 lb/hr	0 / 3586
336	IR4	Ink Mixing Station Exhaust		70 lb/hr	0 / 3587

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

See II. Plant-Wide Conditions for Plant-Wide Emission Limits.

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 413, 414, 415

Table 3. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	CE ID	CE Description
413	D1	Press Dust Collector	Cornstarch	0.63 lb/hr	CE5	Baghouse
414	D2	End Seal Dust Collector (E)		0.63 lb/hr	CE6	Baghouse
415	D3	End Seal Dust Collector (W)		0.63 lb/hr	CE7	Baghouse

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 4. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
413, 414, 415	Opacity	20%	LCO 10.7
	Particulate Matter	0.1 gr/dscf	567 IAC 23.3(2)"a"(2) LCO 10.9(1)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack testing is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3011E

Table 5. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	CE ID	CE Description
3011E	P1	Press 1 Exhaust	Solvents	60 lb/hr	CE-1	Catalytic Oxidizer
3011E	P1A	Press 1 Dryer	Natural Gas	1.6 MMBtu/hr		

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 6. Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3011E	Opacity	20%	LCPH ATI 4211 / PTO 4278 LCCO 10.7
	PM	0.6 lb/mmbtu	LCPH ATI 4211 / PTO 4278 LCO 10.8(2)"b"
	SO_2	500 ppmv	LCPH ATI 4211 / PTO 4278 567 IAC 23.3(3)"e" LCO 10.12(2)
	VOC	2.2 lb/hr, 4.1 tpy[1]	LCPH ATI 4211 / PTO 4278

[1]The total annual emissions from Press 1 shall not exceed 4.1 tpy from stack.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control Device:

A catalytic oxidizer shall be installed to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in "Operating Condition Monitoring and Recordkeeping" shall be installed, maintained and operating during the operation of the emission unit and control device at all times.
Authority for Requirement: LCPH ATI 4211 / PTO 4278

NESHAP Applicability:

- This facility is subject to the area source requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry.

Authority for Requirement: LCPH ATI 4211 / PTO 4278

Operating Limits:

A. The oxidizer inlet temperature shall be maintained at a minimum of 590°F.
B. The catalyst reactivity shall be checked annually until the reactivity falls below 90%. Once the catalyst reactivity falls below 90% the catalyst shall be replaced.
C. The press shall be limited to its rated capacity of 60 lb/hr of ink and solvent usage.
D. All ink and solvent containers shall remain covered when not in use. Steps shall be taken to prevent spills or leaks. Spills shall be cleaned up promptly.
E. The press shall be limited to a total run time of 3840 hours based on a 12-month rolling total.
F. This facility commits to maintaining area source status by meeting the standards of 40 CFR 63.8230(a)(2)(i) and (ii).

Authority for Requirement: LCPH ATI 4211 / PTO 4278

Operating Condition Monitoring and Recordkeeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.

1. Oxidizer inlet temperatures on a continuous basis.
2. Record ink and solvent usage on a monthly basis.
3. Record all maintenance and repair completed on the control device.
4. Maintain all Material Safety Data Sheets of all inks and solvents used in Press 1.
5. Maintain the annual catalyst reactivity reports.
6. Calculate the VOC% ink/solvent ratio on an annual basis.
7. Record the hours of operation on a monthly and 12-month rolling basis.
8. Recordkeeping to maintain area source status shall be done according to 40 CFR 63.829(d).
9. Reporting to maintain area source status shall be done according to 40 CFR 63.830(b)(1).

Authority for Requirement: LCPH ATI 4211 / PTO 4278

Quarterly Report Requirements:

The following information shall be submitted to this department by the 15th of each month for the previous quarter (January 15, April 15, July 15 and October 15).

- Monthly process rate, monthly and 12-month rolling total hours of operation.

Authority for Requirement: LCPH ATI 4211 / PTO 4278

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Table 7. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3011E	4211 / 4278	31.1	Vertical, w/ obstructing rain cap	23	300	6830

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack testing is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☒ **No** ☐

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒
Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3013E, 3093E, 3102E, EP3123E, 3114E, 3143E, 4012E, 4013E, 5071E

Table 8. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	LCPH ATI / PTO
3013E	P1C	Press 1 Corona Treater Exhaust	Electricity	4 KWH/hr	4097 / 4279
3093E	P9C	Press 9 Corona Treater		4 KWH/hr	4909 / 4950
3102E	P10C	Press 10 Corona Treater		5 KWH/hr	4908 / 4948
3114E	P11C	Press 11 Corona Treater		5 KWH/hr	4735 / 4807
3123E	P12C	Press 12 Corona Treater		5 KWH/hr	5059 / 5069
3143E	P14C	Press 14 Corona Treater		10 KWH/hr	3097 / 3588
4012E	L1C1	Laminator 1 Patch Corona Treater		4 KWH/hr	4249 / 4340
4013E	L1C2	Laminator 1 Barrier Corona Treater		4 KWH/hr	4250 / 4341
5071E	ES7C	End Seal Bag Machine No. 7 Corona Treater		4 KWH/hr	5186 / 5195

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 9. Emission Limits.

EP	EU	Opacity	Ozone	LCPH ATI / PTO
3013E	P1C	NA	0.29 lb/hr, 1.27 tpy	4097 / 4279
3093E	P9C	NA	NA	4909 / 4950
3102E	P10C	NA	NA	4908 / 4948
3114E	P11C	NA	NA	4735 / 4807
3123E	P12C	NA	NA	5059 / 5069
3143E	P14C	NA	NA	3097 / 3588
4012E	L1C1	20%	0.29 lb/hr, 1.28 tpy	4249 / 4340
4013E	L1C2	20%	0.29 lb/hr, 1.28 tpy	4250 / 4341
5071E	ES7C	NA	NA	5186 / 5195

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

The maximum power setting for EP3013E, EP3093E, EP3123E, EP4012E and EP4013E is 4 kW.

These units shall not exceed the maximum power rating of 4 kW. An increase in the maximum power rating would be considered a modification and a new permit would need to be issued.

Authority for Requirement: LCPH ATI 4097 / PTO 4279
LCPH ATI 4909 / PTO 4950
LCPH ATI 4249 / PTO 4340
LCPH ATI 4250 / PTO 4341

The maximum airflow rate for EP4012E and EP4013E is 400 scfm ± 10%.

Authority for Requirement: LCPH ATI 4249 / PTO 4340
LCPH ATI 4250 / PTO 4341

The maximum power rating for EP3102E, EP3114E and 3123E shall not exceed 5KW. An increase in the maximum power rating would be considered a modification and a new permit would need to be issued.

Authority for Requirement: LCPH ATI 4908 / PTO 4948
LCPH ATI 4735 / PTO 4807
LCPH ATI 5059 / PTO 5069

EP3143E shall not exceed the maximum power rating of 10 Kilowatt.

Authority for Requirement: LCPH ATI 3097 / PTO 3588

Recordkeeping Requirements:

A logbook of operation shall be maintained for this source. The following information shall be recorded and kept on site for a period of no less than five years.

- All maintenance performed on the corona treater
- Any changes to equipment that could result in increased ozone emissions

These records shall be available on site for viewing by air pollution control personnel at all times.

Authority for Requirement: LCPH ATI 4097 / PTO 4279
LCPH ATI 4249 / PTO 4340
LCPH ATI 4250 / PTO 4341

Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Table 10. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3093E	4909 / 4950	32.8	Vertical, unobstructed	8.5	131	600
3102E	4908 / 4948	32.1	Vertical, unobstructed	8.5	131	800
3114E	4735 / 4807	31	Vertical, unobstructed	12	130	700
3123E	5059 / 5069	33	Vertical, unobstructed	8.5	131	500
5071E	5186 / 5195	33	Vertical, unobstructed	5.5	131	400

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3061E

Table 11. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
3061E	P6	Press 6 Exhaust	Solvents	28.00 lb/hr
	P6A	Press 6 Dryer	Natural Gas	0.38 MMBtu/hr
	P6B	Press 6 Flame Treater		0.11 MMBtu/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 12. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3061E	Opacity	20%	LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCO 10.8(2)"b"
	SO_2	500 ppmv	567 IAC 23.3(3)"e" LCO 10.12(2)

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3092E

Table 13. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
3092E	P9	Press 9 Exhaust	Solvents	66 lb/hr
3092E	P9A	Press 9 Dryer	Natural Gas	1.60 MMBtu/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 14. Emission Limits.

EP	EU	Opacity	PM	SO_2	VOC[1]	LCPH ATI / PTO
3092E	P9 P9A	20%	0.6 lb/MMBtu	500 ppmv	42.6 lb/hr	4910 / 4949

[1]The emission limit is based on this sources potential to emit based on a process rate limit of 66 lb ink/hr at a VOC loss rate of 0.645 lb/lb.

Table 15. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3092E	Opacity	20%	LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCO 10.8(2)"b"
	SO_2	500 ppmv	567 IAC 23.3(3)"e" LCO 10.12(2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational imits and requirements listed below.

NESHAP Applicability:

- This facility is subject to the area source requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry.

Authority for Requirement: LCPH ATI 4910 / PTO 4949

Operating Limits:

1. The press shall be limited to its rated capacity of 66 lb/hr of ink and solvent usage.
2. All ink and solvent containers shall remain covered when not in use. Steps shall be taken to prevent spills or leaks. Spills shall be cleaned up promptly.
3. The press shall be limited to a total run time of 5400 hours based on a 12-month rolling total.
4. This facility commits to maintaining area source status by meeting the standards of 40 CFR 63.8230(a)(2)(i) and (ii).

Authority for Requirement: LCPH ATI 4910 / PTO 4949

Operating Condition Monitoring and Recordkeeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.

1. Record ink and solvent usage on a monthly basis.
2. Maintain all Material Safety Data Sheets of all inks and solvents used in Press 9.
3. Calculate the VOC% ink/solvent ratio on an annual basis to verify compliance with the 0.645 lb/lb VOC loss rate.
4. Record the hours of operation on a monthly and 12-month rolling basis.
5. Recordkeeping to maintain area source status shall be done according to 40 CFR 63.829(d).
6. Reporting to maintain area source status shall be done according to 40 CFR 63.830(b)(1).

Authority for Requirement: LCPH ATI 4910 / PTO 4949

Quarterly Report Requirements:

The following information shall be submitted to this department by the 15th of each month for the previous quarter (January 15, April 15, July 15 and October 15).

- Monthly process rate, monthly and 12-month rolling total hours of operation.

Authority for Requirement: LCPH ATI 4910 / PTO 4949

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 16. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3092E	4910 / 4949	27.3	Vertical, unobstructed	16	100	5000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3101E

Table 17. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
3101E	P10	Press 10 Exhaust	Solvents	60 lb/hr
	P10A	Press 10 Dryer	Natural Gas	1.6 MMBtu/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 18. Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3101E	VOC	40 lb/hr*	LCPH ATI 4911 / PTO 4947

*The emission limit is based on this sources potential to emit based on a process rate limit of 40 lb inks/hr at a VOC loss rate of 0.666 lb/lb.

Table 19. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3101E	Opacity	20%	LCPH ATI 4911 / PTO 4947 LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCPH ATI 4911 / PTO 4947 LCO 10.8(2)"b"
	SO_2	500 ppmv	LCPH ATI 4911 / PTO 4947 567 IAC 23.3(3)"e" LCO 10.12(2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

- This facility is subject to the area source requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry.

Authority for Requirement: LCPH ATI 4911 / PTO 4947

Operating Limits:

A. The press shall be limited to its rated capacity of 60 lb/hr of ink and solvent usage.
B. All ink and solvent containers shall remain covered when not in use. Steps shall be taken to prevent spills or leaks. Spills shall be cleaned up promptly.
C. This facility commits to maintaining area source status by meeting the standards of 40 CFR 63.8230(a)(2)(i) and (ii).

Authority for Requirement: LCPH ATI 4911 / PTO 4947

Operating Condition Monitoring and Recordkeeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.

1) Record ink and solvent usage on a monthly basis.
2) Maintain all Material Safety Data Sheets of all inks and solvents used in Press 10.
3) Calculate the VOC% ink/solvent ratio on an annual basis to verify compliance with the 0.666 lb/lb VOC loss rate.
4) Recordkeeping to maintain area source status shall be done according to 40 CFR 63.829(d).
5) Reporting to maintain area source status shall be done according to 40 CFR 63.830(b)(1).

Authority for Requirement: LCPH ATI 4911 / PTO 4947

Quarterly Report Requirements:

Monthly process rate, monthly and 12-month rolling total hours of operation.
Authority for Requirement: LCPH ATI 4911 / PTO 4947

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 20. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3101E	4911 / 4947	28.5	Vertical, unobstructed	18	100	6400

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3111E, 3113E

Table 21. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
3111E	P11	Press 11 Exhaust	Solvents	60 lb/hr
	P11A	Press 11 Interstation Dryer	Natural Gas	1.28 MMBtu/hr
3113E	P-11A	Press 11 Tunnel Exhaust	Natural Gas	0.32 MMBtu/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 22. Emission Limits.

EP	Opacity	Particulate Matter	SO_2	VOC	LCPH ATI / PTO
3111E	20%	0.6 lb/MMBtu	500 ppmv	38.4 lb/hr[1], 39.4 tpy[2]	4733 / 4805
3113E	20%	0.6 lb/MMBtu	500 ppmv	38.4 lb/hr[1], 39.4 tpy[2]	4734 / 4806

Table 23. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3111E 3113E	Opacity	20%	LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCO 10.8(2)"b"
	SO_2	500 ppmv	567 IAC 23.3(3)"e" LCO 10.12(2)

[1]The emission limit is based on this sources potential to emit on a process rate of 60 lb of inks/hr and assuming all VOC emissions from Press 11 were only exhausted through this EP.

[2]The total annual emissions of VOC from Stations 5 and 6 of Press 11 shall not equal or exceed 39.4 tons. This emission limit does not include stations 1-4.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

- Ink / solvent usage: Process rate of 60 lb/hr based on a 12-month rolling total

Authority for Requirement: LCPH ATI 4733 / PTO 4805
LCPH ATI 4834 / PTO 4806

Operating Condition Monitoring and Recordkeeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.

1. A data log recording solvent usage for all six stations of printing press 11 shall be maintained.
2. Material Safety Data Sheets of all inks and solvents used in Press 11.
3. Monthly ink and solvent usage shall be recorded to determine compliance with the process and emission rate limit of 40 tpy for the Stations 5 and 6 modification.

Authority for Requirement: LCPH ATI 4733 / PTO 4805
LCPH ATI 4734 / PTO 4806

Quarterly Report Requirements:

The following information shall be submitted to this department by the 15th of each month for the previous quarter (January 15, April 15, July 15 and October 15).

- A quarterly summary of VOC emissions from the operation of stations 5 and 6 for press 11.

Authority for Requirement: LCPH ATI 4733 / PTO 4805
LCPH ATI 4734 / PTO 4806

Additional Condition for operation:

1. The total emissions of VOC from flexographic printing stations 5 and 6 of printing press 11 must be less than or equal to 39 tons per 12 month rolling period.
2. A data log recording solvent usage for all six stations of printing press 11 shall be maintained by the owner. This record shall be available for inspection by representatives of the Linn County Health Department. All records of solvent usage shall be maintained at the site for 5 years.
3. An annual summary of VOC emissions due to the operation of stations 5 and 6 for press 11 shall be submitted in writing to the Linn County Health Department at the end of the calendar year. The due date shall be January 31.

Authority for Requirement: IDNR Construction Permit 87-A-200

Emission Point Characteristics
This emission point shall conform to the specifications listed below.

Table 24. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3111E	4733 / 4805	28.8	Vertical, unobstructed	18	100	3800
3113E	4734 / 4806	32.1	Vertical, unobstructed	16	100	3800

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3122E

Table 25. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
3122E	P12	Press 12 Exhaust	Solvents	36 lb/hr
	P12A	Press 12 Dryer	Natural Gas	1.6 MMBtu/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 26. Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3122E	VOC	24 lb/hr*	LCPH ATI 5058 / PTO 5068

*The emission limit is based on this sources potential to emit based on a process rate limit of 36 lbs. inks/hr at a VOC loss rate of 0.666 lb/lb.

Table 27. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3122E	Opacity	20%	LCPH ATI 5058 / PTO 5068 LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCPH ATI 5058 / PTO 5068 LCO 10.8(2)"b"
	SO_2	500 ppmv	LCPH ATI 5058 / PTO 5068 567 IAC 23.3(3)"e" LCO 10.12(2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

- This facility is subject to the area source requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry.

Authority for Requirement: LCPH ATI 5058 / PTO 5068

Operating Limits:
A. Ink/solvent usage: Process rate is limited to 36 lbs/hr based on a 12-month rolling total.
B. This facility commits to maintaining area source status by meeting the standards of 40 CFR 63.8230(a)(2)(i) and (ii).
Authority for Requirement: LCPH ATI 5058 / PTO 5068

Operating Condition Monitoring and Recordkeeping:
All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.
A. Material Safety Data Sheets of all inks and solvents used in Press 12.
B. Monthly ink and solvent usage shall be recorded to determine compliance with the process and emission rate limits.
C. Recordkeeping to maintain area source status shall be done according to 40 CFR 63.829(d).
D. Reporting to maintain area source status shall be done according to 40 CFR 63.830(b)(1).
Authority for Requirement: LCPH ATI 5058 / PTO 5068

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Table 28. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3122E	5058 / 5068	31.1	Vertical, unobstructed	25 x 25	100	7,500

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3141E

Table 29. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	CE ID	CE Description
3141E	P14	Press 14 Exhaust	Solvents	80 lb/hr	CE4	Catalytic Oxidizer
	P14A	Press 14 Dryer	Natural Gas	0.8 MMBtu/hr		
	P14B	Press 14 Oven		0.7 MMBtu/hr		
	P14D	Press 14 Catalytic Oxidizer		3.5 MMBtu/hr		

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 30. Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3141E	VOC	37.1[1]	LCPH ATI 3075 / PTO 3580

[1]The total annual emissions from in-stack or process fugitives shall not exceed 37.1 tpy to maintain this project as a "synthetic" minor for PSD permitting purposes.

Table 31. General Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3141E	Opacity	20%	LCPH ATI 3075 / PTO 3580 LCO 10.7
	Particulate Matter	0.6 lb/MMBtu	LCPH ATI 3075 / PTO 3580 LCO 10.8(2)"b"
	SO_2	500 ppmv	LCPH ATI 3075 / PTO 3580 567 IAC 23.3(3)"e" LCO 10.12(2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control Device:

A catalytic oxidizer shall be installed to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in "Operating Condition Monitoring and Recordkeeping" shall be installed, maintained and operating during the operation of the emission unit and control device at all times.
Authority for Requirement: LCPH ATI 3075 / PTO 3580

NESHAP Applicability:

- This facility is subject to the area source requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry.

Authority for Requirement: LCPH ATI 3075 / PTO 3580

Operating Limits:

A. The oxidizer inlet temperature shall be maintained at a minimum of 590 °F.
B. The catalyst reactivity shall be checked annually until the reactivity falls below 90%. Once the catalyst reactivity falls below 90%, the catalyst shall be replaced.
C. The press shall be limited to a process rate of 32,066 lb/month of ink and solvent usage based on a 12-month rolling average.
D. The catalytic oxidizer must be operated whenever the printing line is in operation, except for the following emergency bypass condition:
   When the lower explosive limit (LEL) exceeds 35%, an alarm will sound and the oxidizer may be shut down to prevent explosion. If the oxidizer is bypassed, the printing line shall be shutdown after one-half hour or after the LEL reaches 50-55%, whichever is sooner.
E. All ink and solvent containers shall remain covered when not in use. Steps shall be taken to prevent spills or leaks. Spills shall be cleaned up promptly.
F. The oxidizer shall have a minimum capture rate efficiency of 85% and a minimum operating destruction rate efficiency of 95%.
G. This facility commits to maintaining area source status by meeting the standards of 40 CFR 63.8230(a)(2)(i) and (ii).

Authority for Requirement: LCPH ATI 3075 / PTO 3580

Operating Condition Monitoring and Recordkeeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives.

1. Oxidizer inlet temperatures on a continuous basis.
2. Record ink and solvent usage on a monthly basis.
3. Record all maintenance and repair completed on the control device.
4. Maintain all Material Safety Data Sheets of all inks and solvents used in Press 14.
5. Maintain the annual catalyst reactivity reports.

6. All emergency bypass periods for the catalytic oxidizer including the date(s), time and duration of the bypass, and process rate.
7. Calculate the VOC% ink/solvent ratio on an annual basis.
8. Calculate on a monthly and 12-month rolling basis the emissions from Press 14 based on current source test data and annual VOC % ink/solvent ratio.
9. Recordkeeping to maintain area source status shall be done according to 40 CFR 63.829(d).
10. Reporting to maintain area source status shall be done according to 40 CFR 63.830(b)(1).

Authority for Requirement: LCPH ATI 3075 / PTO 3580

Quarterly Report Requirements:

The following information shall be submitted to this department by the 15th of each month for the previous quarter (January 15, April 15, July 15 and October 15).

- Monthly process rate
- Monthly and 12-month rolling total VOC emissions.

Authority for Requirement: LCPH ATI 3075 / PTO 3580

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 32. Stack Characteristics.

		Stack Characteristics				
EP	**LCPH ATI / PTO Numbers**	**Stack Height (feet, above ground)**	**Discharge Style**	**Stack Opening (inches, dia.)**	**Exhaust Temp. (°F)**	**Exhaust Flowrate (acfm)**
3141E	3075 / 3580	36.2	Vertical, unobstructed	30	300	7600

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack testing is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring Plan
Catalytic Oxidizer for VOC Control

I. Background

A. Emissions Unit

Description: Flexographic Printing Press
Identification: Press 14
Stack designation: EP 3141E
Facility: Cryovac Inc. Sealed Air Corp.
Cedar Rapids, IA

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: LCPH ATI 3075 / PTO 3580
Regulated pollutant (PSEU): VOC
Emission limit: 37.1 tpy
Monitoring requirements in permit: Oxidizer inlet temperature continuous

C. Control Technology: Catalytic oxidizer (with recuperative heat exchanger and "cold-side bypass control)

II. Monitoring Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table A – 1.

(The table was adapted from the EPA's "Technical Support Document for Title V Permitting of Printing Facilities" dated January 2005, Protocol 2 for catalytic oxidizers, pages D-53 thru D-55.)

TABLE A – 1. MONITORING APPROACH FOR CATALYTIC OXIDIZER

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed (Inlet) temperature.[a]	Work practice / inspection.	Performance test	Catalyst activity assessment.
Measurement Approach	Continuously record the operating temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.[c]	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	An excursion is identified as a measurement of 550°F or less, or 50°F less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The conversion efficiency is compared to the typical value for fresh catalyst of 99.0% at 600°F. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer of 90% or less at 600°F.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
III. Performance Criteria				
A. Data Representative -ness	A thermocouple employed to measure the oxidizer chamber temperature shall be accurate to within 0.5% of temperature measured or ±5°F, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the regulatory Agency prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
B. Verification of Operational Status	Temperatures recorded on chart paper, or on electronic media if electronic data recording is implemented.	Inspection records.	Not applicable.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20F°. [a]	Not applicable.	EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	• External inspection – monthly. • Internal inspection – annually.[c]	Once every 5 years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart, or on electronic media if electronic data recording is implemented.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Not applicable.	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of catalyst analyses and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to agency 30 days prior to test date. Submit test report 60 days after conducting a performance test.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Semiannually.	For each performance test conducted.	Semiannually.

[a] Facility to maintain Standard Operating Procedure on-site for verifying accuracy of system.

[c] Internal inspection of recuperative units should include annual assessment of heat exchanger for leakage (this assessment may be comprised of an internal inspection, or other method of assessing for leakage.)

Emission Point ID Number: 3142E

Table 33. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	CE ID	CE Description
3142E	P14E	Press 14 Bypass	Solvents	80 lb/hr	-	-

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Not Applicable

Operational Limits & Requirements

Control Device:

- A magnum 8000 Catalytic Oxidizer shall be used to control emissions from the press.
- In the event of an emergency, the by-pass stack may be used. This stack shall be used for as little time as necessary to safely shutdown the press without causing injury or damage to the equipment.

Authority for Requirement: LCPH ATI 3075 / PTO 3601

Operating Limits:

The catalytic oxidizer must be operated whenever the printing line is in operation, except for the following emergency by-pass condition:

When the lower explosive limit (LEL) exceeds 35%, an alarm will sound and the oxidizer may be shut down to prevent explosion. If the oxidizer is bypassed, the printing line shall be shutdown after one-hour or after the LEL reaches 50-55%, whichever is sooner.

Authority for Requirement: LCPH ATI 3075 / PTO 3601

Recordkeeping Requirement:
A log of operation shall be maintained for the above listed unit. The following information shall be recorded and kept on site for a period of no less than five years.

- All emergency bypass periods for the catalytic oxidizer including the date, time, and duration of the bypass, cause of bypass use, and a description of the product run at the time of the bypass. Information shall include parameters which will directly or indirectly provide information for ink and solvent usage during the bypass.

These records shall be available on site at all times for viewing by air pollution control personnel.
Authority for Requirement: LCPH ATI 3075 / PTO 3601

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3501E

Table 34. Associated Equipment.

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity	CE ID	CE Description
3501E	S1	Solvent Wash Station	Solvents	10.5 lb/hr	CE2	Catalytic Oxidizer

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 35. Emission Limits.

EP	Pollutant	Emission Limit(s)	Authority for Requirement
3501E	VOC	0.39 tons/yr	LCPH ATI 2270 / PTO 3589

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

The process weight rate, as defined in Linn County Code of Ordinance, Chapter 10, for this source shall be limited to a monthly average of 10.4 lb/hr based on a 12-month rolling average. Documentation of process rates shall be available on site at all times and submitted to the air pollution control officer quarterly.

Authority for Requirement: LCPH ATI 2270 / PTO 3589

Hours of Operation:

This source shall be limited to 520 hours of operation per month based on a 12-month rolling average. Documentation of operation time shall be submitted to the Air Pollution Control Officer quarterly and available at the plant site at all times.

Authority for Requirement: LCPH ATI 2270 / PTO 3589

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Periodic monitoring is not required at this time.

Opacity monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒

Authority for Requirement: 567 IAC 22.108(3)

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the

compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
    a. Form 1.0 "Facility Identification";
    b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
    c. Form 5.0 "Title V annual emissions summary/fee"; and
    d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
    a. Form 1.0 "Facility Identification";
    b. Form 5.0 "Title V annual emissions summary/fee";
    c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
    a. The date, place and time of sampling or measurements
    b. The date the analyses were performed.
    c. The company or entity that performed the analyses.
    d. The analytical techniques or methods used.
    e. The results of such analyses; and
    f. The operating conditions as existing at the time of sampling or measurement.
    g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

a. Comply with all terms and conditions of this permit specific to each alternative scenario.

b. Maintain a log at the permitted facility of the scenario under which it is operating.

c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;

b. Compliance test methods specified in 567 Chapter 25; or

c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

a. Any monitoring or testing methods provided in these rules; or

b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control

measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.

ii. The estimated quantity of the excess emission.

iii. The time and expected duration of the excess emission.

iv. The cause of the excess emission.

v. The steps being taken to remedy the excess emission.

vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.

ii. The estimated quantity of the excess emission.

iii. The time and duration of the excess emission.

iv. The cause of the excess emission.

v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.

vi. The steps that were taken to limit the excess emission.

vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The facility at the time was being properly operated;

c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and

d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:

a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.

b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed

therein as a rate of emissions or as total emissions);
d. The changes are not subject to any requirement under Title IV of the Act.
e. The changes comply with all applicable requirements.
f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

i. A brief description of the change within the permitted facility,
ii. The date on which the change will occur,
iii. Any change in emission as a result of that change,
iv. The pollutants emitted subject to the emissions trade
v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
vii. Any permit term or condition no longer applicable as a result of the change. *567 IAC 22.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*
5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

i. Correct typographical errors
ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
iii. Require more frequent monitoring or reporting by the permittee; or
iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

i. Do not violate any applicable requirements

ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.

iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.

iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;

v. Are not modifications under any provision of Title I of the Act; and

vi. Are not required to be processed as significant modification.

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.

ii. The permittee's suggested draft permit

iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and

iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113* The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.105(1)"a"(4)*

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 <u>except</u> 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.

c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)

e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original

permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit; or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.
567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. *567 IAC 26.1(1)*

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1
909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3
1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4
1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5
401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6
1023 West Madison Street
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Works Dept.
Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.
Air Quality Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000